## HPNS Technical Team Meeting Agenda April 17, 2018, 1000-1100 PT

## 1. Welcome and check-in

**Navy BRAC** – Steve Banister, Pat Brooks, Danielle Janda, Derek Robinson, Thomas Macchiarella

Navy BRAC Consultants – Craig Bias, Scott Hay, Kim Henderson, Kathy Higley

RASO – Zach Edwards, Matt Liscio, Matt Slack

**EPA and consultants** – Karla Brasaemle, <del>John Chesnutt,</del> Jana Dawson, Donna Getty, David Kappelman, Lily Lee, <del>Lyndsey Nguyen</del>

DTSC - Nina Bacey, Janet Naito

**CDPH** – Tracy Jue, Sheetal Singh, Matt Wright

**City (includes OCII/SFDPH and consultants)** – Amy Brownell, Bob Burns, Christina Rain **Water Board** – Tina Low, <del>David Tanouye</del>

- 2. Update on work plan for soil and buildings
  - All comments received as of 3/27/18
  - Working on addressing comments The Navy has started addressing work plan comments pending managers discussions and agreement on the approach.
  - Update on any manager discussions Thomas provided a summary of discussions last week regarding the three important points for the Navy in moving forward with EPA's option 2 proposal: 1) incorporating the 12 mrem/year federal standard, 2) using MARSSIM, and 3) gaining State concurrence that a reasonable effort will support achieving the federal standard. There is a follow-up manager call this Thursday and Zach Edwards/Navy RASO will talk through the three points. The Navy has also started evaluating CERCLA paths, documentation needs for updating criteria, schedules, and pros and cons. The potential paths discussed included a ROD Amendment (or-post ROD change) to update the release criteria or a Work Plan to include updated criteria, facilitate the investigation, and update the ROD as needed based on the results. For example, if updated criteria were exceeded, remedial action would be taken; if updated criteria and release criteria from the ROD were not exceeded, a RACR could be prepared; and if updated criteria were not exceeded but the release criteria from the ROD were exceeded, a ROD Amendment would be needed. Lily indicated that EPA received a 1-pager from the Navy yesterday outlining the three points and has not reviewed, approved, or agreed to the points presented. The State has not received or reviewed the 1-pager yet. Lily indicated that if the Navy follows EPA's proposed approach, no ROD Amendment would be needed since the approach follows the original
  - Nina raised potential concerns with using 12 mrem/year and expressed the need to follow EPA guidance. Thomas referred to OSWER 9385.6-20, dated June 2014 that references 12 mrem/year based on 10<sup>-4</sup> risk as the ARAR. Lily provided a hard copy paper and follow-up email to Pat in November 2017 with the EPA Q&A regarding 12 mrem/year only being used in a narrow context for dose assessments and not for setting-up new cleanup criteria. She indicated that a footnote states that the starting point for setting up new cleanup criteria should be set at 10<sup>-6</sup>. There are interpretation differences of the OSWER guidance to be discussed on a separate call. Matt Wright

indicated that the State also likes to see comparisons to background, statistics, histograms, and posting plots.

## 3. Update on findings reports

- Parcels B and G Soil
  - i. Preparing draft final with updated RTCs for review Nina and Lily provided language to include in the Conclusions and Executive Summary sections of the report to discuss and present ORAU's comments and the regulatory agency findings and differences from their data evaluation and refer to the findings in the appendix. This language looks reasonable and the RTCs have been updated to reflect the language and are with the Navy for review. The draft final (in track changes mode) should be to the Navy by early next week for review and will then be sent to the Technical team for review, likely in late April or early May. Lily indicated that EPA has additional comments on the responses and it was discussed to possibly await the updated RTCs or draft final report as some may be overcome by events. Lily will review and consider the additional comments and may discuss with the Navy prior to submittal.
- Parcels D-2, UC-1, UC-2, and UC-3 Soil
  - i. All comments received as of 3/30/18
  - ii. Preparing draft final with RTCs for review RTCs have been sent to Navy for review and a draft final will be prepared based on the draft final for Parcels B and G.
- Parcel C Soil
  - i. Pending EPA comments expected by the end of next week.
- Parcel E Soil
  - Pending EPA, DTSC, CDPH, and SFDPH (received today) comments –remaining comments expected mid-May as agencies are reviewing the buildings report prior to Parcel E soil.
- Buildings
  - i. Pending EPA, DTSC, CDPH, and SFDPH comments comments expected late next week.
- 4. Future calls/meetings
  - 5/1/18, 1000-1100 PT status call
  - 5/15/18, 1000-1100 PT status call